

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

**Laurie Ortolano,  
Plaintiff,**

**V.**

**The City of Nashua, *et al.*,  
Defendants.**

**Civil Action No. 1:22-cv-00326-LM**

**PRETRIAL STATEMENT OF THE DEFENDANTS,**  
**STEVEN A. BOLTON AND CELIA K. LEONARD**

Defendants Steven A. Bolton, Corporation Counsel for the City of Nashua, New Hampshire, and Celia K. Leonard, a Deputy Corporation Counsel for the City of Nashua, New Hampshire, respectfully submit the following pretrial statement pursuant to Local Rule 16.2.

## 1. Statement of the Case.

The parties were unable to agree on a statement of the case; the defendants' last version follows.

The Plaintiff Laurie Ortolano has sued Attorney Steven Bolton and Attorney Celia Leonard, the City of Nashua's Corporation Counsel and a Deputy Corporation Counsel. Laurie Ortolano claims that she was at the Nashua City Hall to obtain date stamps for two tax abatement requests. Laurie Ortolano claims that Attorney Bolton and Attorney Leonard improperly deprived her of first amendment rights, by causing her arrest for criminal trespass, a Class A misdemeanor, in retaliation for her criticism of City acts and officials. She pled guilty to a violation level offense of trespass. Attorney Bolton and Leonard deny that they caused her arrest for criminal trespass, or violated her constitutional rights in any way.

**2. Witnesses.**

A. The defendants Bolton and Leonard expect to call the following witnesses to testify at trial:

Steven A. Bolton  
Celia K. Leonard  
Mindy Lloyd  
Michael Carignan, retired NPD Chief

B. The defendants Bolton and Leonard may call the following witnesses:

Jesse Neumann  
Timothy Roach, NPD Officer  
Brian Kenney, NPD Deputy Chief  
James W. Donchess, Mayor City of Nashua  
Manuela Perry  
Dorothy Clark  
Kimberly Kleiner

The defendants Bolton and Leonard reserve the right to call any and all of the plaintiff's witnesses, and reserve the right to amend this witness list up to, and including, the time of trial.

**3. Waiver of Claims or Defenses.**

The defendants Bolton and Leonard waive no defenses.

**4. Depositions that May Be Read Into Evidence.**

The defendants Bolton and Leonard do not anticipate reading any depositions into evidence, but reserve the right to do so should it become necessary.

**5. Exhibits.**

The defendants Bolton and Leonard may offer at trial the exhibits listed on the attached Exhibit List.

The defendants Bolton and Leonard reserve the right to amend their Exhibit List up to and including the time of trial. The defendants Bolton and Leonard reserve the right to offer any and all of the exhibits listed by the plaintiff.

**6. Jury Evidence Recording System.**

The parties have conferred and agree to use JERS.

**7. Itemization of Special Damages.**

Not applicable.

**8. Latest Demand and Offer.**

There have been no demands or offers. No mediation or other alternative dispute resolution process has occurred.

**9. Statement of Claim for Attorney's Fees.**

The defendants reserve the right to seek fees pursuant to 42 U.S.C. § 1988.

**10. Request for a View.**

The defendants Bolton and Leonard request a view of Nashua City Hall and the Legal Department. The defendants shall pay the cost in the first instance.

**11. Estimated Length of Trial.**

The defendants Bolton and Leonard anticipate that the trial in this matter will last approximately four (4) days.

Respectfully submitted,

**Steven A. Bolton and Celia K. Leonard,**

By their Counsel,

**UPTON & HATFIELD, LLP,**

Date: March 20, 2025

/s/ Russell F. Hilliard

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### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was forwarded on this day to all counsel of record through the Court's E-filing system.

/s/ Russell F. Hilliard

Russell F. Hilliard